

Walker G. Harman, Jr. [WH-8044]  
THE HARMAN FIRM, P.C.  
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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
KAMEL PRUDE, Individually And On Behalf Of  
All Other Persons Similarly Situated,

**10 Civ. 8122 (TPG)**

*Plaintiff,*

**NOTICE OF MOTION**

-against-

PTM MANAGEMENT CORPORATION d/b/a  
PROFESSIONAL TRANSIT, STEVEN MANN, and  
GREG OHANESSIAN,

*Defendants.*  
-----X

**PLEASE TAKE NOTICE THAT,** upon the annexed memorandum of law, the annexed Declaration of Walker G. Harman, Jr., Esq. together with exhibits attached thereto, and all prior proceedings had herein, Plaintiff will move this Court, before the Honorable Thomas P. Griesa, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an Order:

- a) Directing Defendants to disclose the names and last known address of all current and former employees who worked as Dispatchers within the statutory time period by a date certain or 20 days after the Court's Order;
- b) Authorizing the approval of Plaintiff's Proposed Notice and authorize that the notice be sent, pursuant to 29 U.S.C. § 216(b), to all similarly situated employees

that they may opt into this action should they wish to assert claims under the Fair Labor Standards Act, 29 U.S. C. § 201 *et seq.*; and

- c) For such further relief as this Court may deem just and proper.

Dated: New York, New York  
August 18, 2011

By: \_\_\_\_\_/s\_\_\_\_\_  
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